

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

WARNER RECORDS INC. et al.,)	
)	
Plaintiffs,)	
v.)	Case No. 2:23-cv-00576-JRG-RSP
)	
ALTICE USA, INC. AND CSC HOLD-)	
INGS, LLC,)	
)	
Defendants.)	

JOINT MOTION FOR ENTRY OF STIPULATED E-DISCOVERY ORDER

Plaintiffs Warner Records Inc., Atlantic Recording Corporation, Atlantic Records Group LLC, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Fueled by Ramen LLC, Lava Records LLC, Maverick Recording Company, Nonesuch Records Inc., Rhino Entertainment Company, Rhino Entertainment LLC, Roadrunner Records, Inc., Rykodisc, Inc., Warner Music Inc., Warner Music International Services Limited, Warner Music Nashville LLC, Warner Records/QRI Venture, Inc., Sony Music Entertainment, Arista Music, Arista Records, LLC, LaFace Records, LLC, Sony Music Entertainment US Latin LLC, Ultra Records, LLC, Volcano Entertainment III, LLC, Zomba Recording LLC, Warner Chappell Music, Inc., Cotillion Music, Inc., Gene Autry's Western Music Publishing Co., Golden West Melodies, Inc., Intersong U.S.A., Inc., Unichappell Music Inc., W Chappell Music Corp., W.C.M. Music Corp., Warner-Tamerlane Publishing Corp., Sony Music Publishing (US) LLC, Colgems-EMI Music Inc., EMI April Music Inc., EMI Blackwood Music Inc., EMI Consortium Music Publishing, Inc., EMI Consortium Songs, Inc., EMI Entertainment World Inc., EMI Gold Horizon Music Corp., EMI Miller Catalog Inc., EMI Mills Music Inc., EMI Robbins Catalog Inc., EMI U Catalog Inc., EMI UNART Catalog Inc., Famous Music LLC, Jobete Music Co., Inc., Screen Gems-EMI Music Inc., Stone

Agate Music, and Stone Diamond Music Corp. and Defendants Altice USA, Inc., and CSC Holdings, LLC jointly move for entry of the parties' proposed Stipulated E-Discovery Order attached hereto.

Dated: November 13, 2024

/s/ Jeffrey M. Gould w/ permission

Rudolph Fink IV

William E. Davis, III

Texas State Bar No. 24047416

bdavis@davisfirm.com

Rudolph "Rudy" Fink IV

Texas State Bar No. 24082997

rfink@davisfirm.com

DAVIS FIRM, PC

213 N. Fredonia Street, Suite 230

Longview, Texas 75601

Telephone: (903) 230-9090

Facsimile: (903) 230-9661

Jeffrey M. Gould (*pro hac vice*)

Matthew J. Oppenheim (*pro hac vice*)

Corey Miller (*pro hac vice*)

Keith Howell (*pro hac vice*)

Jeff Kane (*pro hac vice*)

OPPENHEIM + ZEBRAK, LLP

4530 Wisconsin Avenue, NW, 5th Floor

Washington, DC 20016

Telephone: 202-480-2999

jeff@oandzlaw.com

matt@oandzlaw.com

corey@oandzlaw.com

khowell@oandzlaw.com

jkane@oandzlaw.com

Alexander Kaplan (*pro hac vice*)

Carly Kessler Rothman (*pro hac vice*)

Bret Matera (*pro hac vice*)

Lauren Bergelson (*pro hac vice*)

OPPENHEIM + ZEBRAK, LLP

461 Fifth Avenue, 19th Floor

New York, NY 10017

Telephone: (212) 951-1156

alex@oandzlaw.com

/s/ Michael S. Elkin

Michael S. Elkin (*pro hac vice*)

Krishnan Padmanabhan (*pro hac vice*)

Sean R. Anderson (*pro hac vice*)

WINSTON & STRAWN LLP

200 Park Avenue

New York, NY 10166

(212) 294-6700 (telephone)

(212) 294-4700 (facsimile)

melkin@winston.com

kpadmanabhan@winston.com

sranderson@winston.com

Jennifer A. Golinveaux (*pro hac vice*)

WINSTON & STRAWN LLP

101 California Street, 35th Floor

San Francisco, CA 94111-5840

(415) 591-1506 (telephone)

(415) 591-1400 (facsimile)

jgolinveaux@winston.com

Thomas M. Melsheimer

WINSTON & STRAWN LLP

2121 N. Pearl Street, Suite 900

Dallas, TX 75201

(214) 453-6500 (telephone)

(214) 453-6400 (facsimile)

tmelsheimer@winston.com

Sean H. Suber (*pro hac vice*)

WINSTON & STRAWN LLP

35 W. Wacker Drive

Chicago, IL 60601

(312) 558-5600

ssuber@winston.com

Diana Hughes Leiden (*pro hac vice*)

WINSTON & STRAWN LLP

carly@oandzlaw.com
bmatera@oandzlaw.com
lbergelson@oandzlaw.com

Counsel for Plaintiffs

333 S. Grand Avenue, 38th Floor
Los Angeles, CA 90071
(213) 615-1700
dhleiden@winston.com

Christopher Cariello (*pro hac vice*)
Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019
(212) 506-5000
ccariello@orrick.com

Clement S. Roberts (*pro hac vice*)
ORRICK HERRINGTON & SUTCLIFFE LLP
405 Howard Street
San Francisco, CA 94105-2669
(415) 773-5700 (telephone)
(415) 773-5759 (facsimile)
croberts@orrick.com

Mark S. Puzella (*pro hac vice*)
R. David Hosp (*pro hac vice*)
Sheryl Koval Garko (*pro hac vice*)
Laura Brooks Najemy (*pro hac vice*)
ORRICK HERRINGTON & SUTCLIFFE LLP
222 Berkeley Street, Suite 2000
Boston, MA 02116
(617) 880-1800 (telephone)
(617) 880-1801 (facsimile)
mpuzella@orrick.com
dhosp@orrick.com
sgarko@orrick.com
lnajemy@orrick.com

Claire A. Henry
State Bar No.: 24053063
MILLER FAIR HENRY PLLC
1507 Bill Owens Parkway
Longview, TX 75604
(903) 757-6400
claire@millerfairhenry.com

Counsel for Defendants

CERTIFICATE OF CONFERENCE

Plaintiffs have met and conferred with Defendants, and Defendants do not oppose the relief requested in this motion.

/s/ Rudolph Fink IV
Rudolph Fink IV

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served via electronic service on November 13, 2024, to all counsel of record via the Court's CM/ECF system per Local Rule CV-5(a).

/s/ Rudolph Fink IV
Rudolph Fink IV